

<p align="center">FILED CLERK, U.S. DISTRICT COURT</p> <p align="center">11/25/2013</p> <p align="center">CENTRAL DISTRICT OF CALIFORNIA BY: _____ RM _____ DEPUTY</p>

KALIMAN SARKAM
 4420 LEXINGTON AVENUE #1
 LOS ANGELES, CA 90029
 (213) 840-5967

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

-CBM (MANx)

KALIMAN SARKAM

Plaintiff,

VS.

CLIENT SERVICES INC.

DEFENDANT(S).

Case No. *CV 13-8432*

(Out of)

COMPLAINT FOR:

FAIR DEBT COLLECTION

FAIR CREDIT
 REPORTING ACT

ROSENTHAL ACT

Jury Trial Demanded: Yes

I. JURISDICTION

1. This Court has jurisdiction under: 15 U.S.C. sec. 1692 k (d), 15 U.S.C. sec. 1681(p)(b), and 28 U.S.C. sec. 1331, 1337

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II. VENUE

2. Venue is proper pursuant to: 28 U.S.C. sec. 1391(b) where the acts and transaction giving rise to plaintiff's action occurred in the district, where plaintiff resides in this district, and / or where defendant transact business in this district.

III. PARTIES

3. Plaintiff's name is: Kaliman Sarkam Plaintiff resided at: 1316 Tamarind Ave. #2 Los Angeles, California 90028. Is a consumer within the meaning of 15 U.S.C. sec. 1692 a (3), 15 U.S.C. § 1681 a (c).

4. Defendant: Clients Services Inc. is a "debt collector" within the meaning of 15 U.S.C. sec 1692 a (6).

IV. STATEMENT OF FACTS

5. Comes now Kaliman Sarkam who does hereby file this complaint for damages of 15 U.S.C. sec. 1692, et seq. (FDCPA) and the California Rosenthal Act, Civil Code sec. 1788 et seq. 15 U.S.C. sec. 1681 et seq. (FCRA) based upon defendant(s) violations of the Fair Debt Collection Practices Act, Rosenthal Act and Fair Credit Reporting Act.

6. Plaintiff obtained his consumer reports from the three major credit reporting agencies and found entries by entities that he was unfamiliar with in the report. Plaintiff found after examination of his Transunion consumer credit reports that defendant Client Services Inc. had obtained Plaintiff consumer credit reports on July 10, 2012 and has continuously reported to date.

7. Experian, Transunion, Equifax, is a credit reporting agency within the meaning FCRA 15 U.S.C. 1681a (f).

8. Consumer credit report is a consumer report within the meaning of the FCRA 15 U.S.C. sec. 1681a (d).

9. The FCRA 15 U.S.C. sec. 1681b defines the permissible purposes for

1 which a person may obtain a consumer credit report. As to the Defendant first
2 inquiry pull, the Plaintiff is/ was not at any given time involved in the any
3 related underlying credit transaction. Plaintiff has not at any given time initiated
4 the any transaction, nor has Plaintiff participated in the any transaction in writing
5 or otherwise.
6

7
8 10. Defendants regularly engaged as furnishers of consumers Transunion,
9 credit file, such permissible purposes as defined by 15
10 U.S.C. § 1681b are generally if the consumer makes application for credit, makes
11 application for employment, for underwriting of insurance involving the
12 consumer, or is offered a bonafide offer of credit as a result of the inquiry.
13
14

15
16 11. Plaintiff has never had any business dealings or any accounts with made
17 application for credit from, made application for employment with, applied for
18 insurance from or received a bonafide offer of credit from the defendant that
19 constitute a any contract
20
21

22 12. On July 10, 2012 Defendant Clients Services Inc.
23 obtained the plaintiff consumer credit reports without consent in violation of
24 the FCRA 15 U.S.C. sec. 1681b. Defendant failure to conduct an investigation
25 properly of the August 25, 2012 dispute from the Transunion credit Bureau and
26 take any remedial actions of the September 21, 2012 reinvestigation procedure
27
28

1 under § 1681s-2(b) after notification of Plaintiff dispute; Said actions by
2 defendant holds liable in favor to Plaintiff reward/relief damages as a matter of
3 law plaintiff Transunion, record thereby reducing plaintiff credit score, and loss
4 of societal pleasures.
5

6
7
8 13. On August 28, 2012, January 25, 2013, and November 12, 2013 Plaintiff
9 sent via United States Postal Service Certified Mail a letter requesting formal
10 debt validation/ illegal inquiry pull. This was in an effort to
11 mitigate damages in obtaining Plaintiff's credit report before taking civil action
12 in accordance with (FDCPA) 15 U.S.C. sec. 1692g,. Plaintiff notice
13 included defendants violations of the (FCRA) 15 U.S.C. sec. 1681b. A
14
15

16
17
18 14. On October 15, 2012 Plaintiff has received no correspondence to
19 said notices sent to Defendant. The actions of the Defendant obtaining consumer
20 credit report without validation for permissible purposes or contract bearing
21 signature between defendant and plaintiff consent, are clear and willful
22 violations of FCRA, 15 U.S.C. § 1681b and an illegal practices against
23 Plaintiff's right to privacy.
24
25

26
27 15. Plaintiff disputed with (3) credit reporting agency's from the month of
28 August and September 2012. Defendant at no time has communicated with

1 Plaintiff what justification they may have had by obtaining Plaintiff credit
 2 profile. Plaintiff have given ample opportunity for Defendant to justify their
 3 action, the August 25, 2012 sent letter the January 25, 2013 second notice and
 4 November 12, 2013 letter upon 10 day response. Defendant has failed to
 5 respond to said notice.
 6
 7

8
 9 16. Plaintiff discovery of violations brought forth herein occurred in
 10 August 2012 and are within the statute of limitations as defined in the FCRA,
 11 15 U.S.C. sec.1681p FDCPA 15 U.S.C. sec. 1692k (d).
 12
 13

14 **V. CAUSES OF ACTION**

15 **FIRST CAUSE OF ACTION**

16 Violations of FDCPA 15 U.S.C. 1962 e,f,g
 17

18 **(As against Defendant(s):** Clients Services Inc.
 19

20 17. Plaintiff re-alleges and incorporates paragraphs 5-16. Plaintiff is a
 21 Consumer within the meaning of the FDCPA 15 U.S.C. sec. 1692a(3)
 22 Clients Services Inc. are debt collectors within the meaning of
 23 FDCPA 15 U.S.C. sec 1692a(6).
 24
 25

26 18.Plaintiff re-alleges and incorporates paragraph 5-16. Based on the
 27 foregoing consumer credit reports. The Defendant Is violating FDCPA and
 28

1 FCRA violations include but are not limited to the following: Clients Services
2 Inc. violated 15 U.S.C. sec. 1692e(10) by the use of any false
3 representation or deceptive means to collect or attempt to collect any debt or to
4 obtain information concerning consumer.
5

6
7 19.Plaintiff re-alleges and incorporates paragraph 5-16. Clients Services Inc.
8 violated 15 U.S.C. sec. 1692d by engaging in conduct the natural
9 consequences of which is to harass, oppress, or abuse any person.
10
11

12
13 **SECOND CAUSE OF ACTION**
14

15 Violation of FCRA 15 U.S.C. SEC. 1681 b
16

17 **As against Defendant(s):** Clients Services Inc.
18

19 20. Plaintiff re-alleges and incorporates paragraph 5-16. Plaintiff is a
20 consumer within the meaning of the FCRA 15 U.S.C. sec. 1681a (c).
21 Clients Services Inc. is a furnisher of information within the meaning
22 of the FCRA 15 U.S.C. sec. 1681 s-2
23

24 21. Plaintiff re-alleges and incorporates paragraph 5-16. Plaintiff did not
25 Initiate a firm offer of credit (loan, credit card) with defendant. Plaintiff did not
26 Initiate firm offer of insurance with defendant. Plaintiff did not initiate
27
28

1 employment with defendant. Defendant was not directed by a court order to pull
 2 plaintiff consumer report. Defendant is no gov't agency under USA Patriot Act
 3
 4 reply: UNITED STATES v. McNeil 362 F.3d 570 "9th Circuit Court of Appeals"

5
 6 22. Plaintiff re-alleges and incorporates paragraph 5-16. Based on the
 7 foregoing consumer credit report. Defendant willfully violated the FCRA.
 8 Defendant violations include, but are not limited to the following: Clients
 9 Services Inc. willfully violated 15 U.S.C. sec. 1681b(f) by obtaining
 10 plaintiff consumer report without a permissible purpose as defined by 15 U.S.C.
 11
 12 sec. 1681b
 13

14 15 **THIRD CAUSE OF ACTION**

16 Violation Civil Liabilities for non-compliance 15 U.S.C. sec. 1681 o, n

17
 18 **(As against Defendant(s):** Clients Services Inc.

19 23. Plaintiff re-alleges and incorporates paragraph 5 -16. Plaintiff is a
 20 consumer within the meaning of the FCRA 15 U.S.C. sec. 1681a (c).
 21 Capital One Bank (USA) N.A. is a furnisher of information within the meaning
 22 of the FCRA 15 U.S.C. sec. 1681 s-2
 23

24
 25 24. Plaintiff re-alleges and incorporates paragraph 5-16.
 26 Clients Services Inc. willful procuring or causing to be procured an
 27
 28 investigative consumer report without clearly and accurately disclosing to

1 plaintiff that the report had been requested.

2
3
4 25. Plaintiff re-alleges and incorporates paragraph 5-16. Clients Services
5 Inc. without informing plaintiff of the right to request disclosure in violation 15
6 U.S.C. sec 1681d q. Actions on the part of defendant demonstrates a
7
8 willful disregard for federal law and constitutes a blatant attempt to injure or
9
10 ruin the credit rating of plaintiff since defendant has demonstrated an inability
11 to validate the alleged debt and subsequently attempted coerce payment. 15
12 U.S.C sec. 1681 n
13

14 **V. REQUEST FOR RELIEF**

15
16 29. That this court grant judgement against defendant for first claim for relief
17
18 1) Actual damages determined by jury 2.) Punitive & Statutory damages 15
19 U.S.C. sec. 1692 d (1) 1692 f (6) Remedies 1692 k, Rosenthal Act \$1,000.00 per
20 statute 3.) legal cost and fees. 4.) Any relief as the court see fit.
21

22
23 30. That this court grants judgement against defendant
24 for: second claim for relief 1.) Actual damages to be
25 determined by jury 2.) Punitive and Statutory damages FCRA 15 U.S.C. sec.
26 1681b \$1000.00 3.) court fees and cost 4.) Any relief as court see fit.
27
28

7010 0290 0003 3031 3440

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SAINT CHARLES MO 63301

OFFICIAL USE

Postage	\$ 0.45	0027
Certified Fee	\$2.95	09
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 3.40	08/28/2012

Sent To Client Services Inc.
 Street, Apt. No., or PO Box No. 3451 Harry S. Truman
 City, State, ZIP+4 St Charles, Mo 63301

PS Form 3800, August 2006 See Reverse for Instructions

U.S. Postal ServiceTM
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CRUEL LANE MO 64701

OFFICIAL USE

Postage	\$ 0.45	0711
Certified Fee	\$2.95	04
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 3.40	08/25/2012

Sent To Transunion Consumer Relations
 Street, Apt. No., or PO Box No. P.O. box 2000
 City, State, ZIP+4 Chester Pa 19022-2000

PS Form 3800, August 2006 See Reverse for Instructions

7012 0470 0001 7942 2947

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ALLEN TX 75013

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Postage	\$ 0.45	0711
Certified Fee	\$2.95	04
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 3.40	08/25/2012

Sent To E. E. PERIANI
 Street, Apt. No., or PO Box No. P.O. Box 2002
 City, State, ZIP+4 Allen Tx 75013

PS Form 3800, August 2006 See Reverse for Instructions

7012 0470 0001 7942 2930

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ATLANTA GA 30377

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Postage	\$ 0.45	0711
Certified Fee	\$2.95	04
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 3.40	08/25/2012

Sent To F. D. W. F. A. R.
 Street, Apt. No., or PO Box No. P.O. Box 740256
 City, State, ZIP+4 Atlanta GA 30377-0256

PS Form 3800, August 2006 See Reverse for Instructions

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Postage	\$	\$0.45	0008
Certified Fee		\$2.95	
Return Receipt Fee (Endorsement Required)		\$0.00	
Restricted Delivery Fee (Endorsement Required)		\$0.00	
Total Postage & Fees	\$	\$3.40	

Sent To
 Street, Apt. No.,
 or PO Box No. *Transunion Consumer Relation*
P.O. Box 2000
 City, State, ZIP+4 *Chester Pa 19022-2000*

PS Form 3800, August 2006 See Reverse for Instructions

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Postage	\$	\$0.45	0008
Certified Fee		\$2.95	
Return Receipt Fee (Endorsement Required)		\$0.00	
Restricted Delivery Fee (Endorsement Required)		\$0.00	
Total Postage & Fees	\$	\$3.40	

Sent To
 Street, Apt. No.,
 or PO Box No. *EXPERIAN*
P.O. Box 2002
 City, State, ZIP+4 *Allen, TX 75013*

PS Form 3800, August 2006 See Reverse for Instructions

U.S. Postal Service™
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OFFICIAL USE

Postage	\$	\$0.45	0008
Certified Fee		\$2.95	
Return Receipt Fee (Endorsement Required)		\$0.00	
Restricted Delivery Fee (Endorsement Required)		\$0.00	
Total Postage & Fees	\$	\$3.40	

Sent To
 Street, Apt. No.,
 or PO Box No. *Client Services Inc.*
3451 Harry S Truman
 City, State, ZIP+4 *St Charles, Mo 63301*

PS Form 3800, August 2006 See Reverse for Instructions

1E9E 988T 1886 389
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2011 11 50 0000 0000 0000 0000

CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	90.46
Certified Fee		\$3.10
Return Receipt Fee (Endorsement Required)		\$0.00
Restricted Delivery Fee (Endorsement Required)		\$0.00
Total Postage & Fees	\$	93.56

07/11

Postmark Here
12/20/13
USPS 91209

Sent To
Street, Apt. No.,
or PO Box No.
City, State, ZIP+4

Client Services Inc.
2451 Harry S. Truman
St Charles MO 63301

PS Form 3800, August 2006
PS Form 3800, August 2006
See Reverse for Instructions

KALIMAN SARKAM
1316 TAMARIND AVENUE
HOLLYWOOD, CA 90028

CERTIFIED MAIL # 7010 0290 0003 3031 3440

CLIENT SERVICES INC.
3451 HARRY S. TRUMA
ST. CHARLES, MO 63301

AUGUST 25, 2012

Re: Unauthorized Credit Inquiry

To Whom It May Concern:

I recently requested my EQUIFAX, TRANSUNION, and EXPERIAN credit report. The credit report showed a credit inquiry by your company that I do not recall authorizing. I understand that you shouldn't be allowed to put an inquiry on my file unless I have authorized it. Please have this inquiry removed from my credit file because it is making it very difficult for me to acquire credit.

I have sent this letter certified mail because I need your prompt response to this issue. Please be so kind as to forward me documentation that you have had the unauthorized inquiry removed.

If you find that I am remiss, and you do have my authorization to inquire into my credit report, then please send me proof of this.

Thanking you in advance,

KALIMAN SARKAM
(without prejudice)

KALIMAN SARKAM
1316 TAMARIND AVENUE
HOLLYWOOD, CA 90028

2ND LETTER

CERTIFIED MAIL: 7011 3500 0002 3943 4882

CLIENT SERVICES INC.
3451 HARRY S. TRUMA
ST. CHARLES, MO 63301

JANUARY 25, 2013

Re: Unauthorized Credit Inquiry

To Whom It May Concern:

I am sending you a request to validate the unauthorized credit pull inquiry on: 07/10/2012 the Fair Debt Collection Practices Act and I have yet to hear from you regarding this matter. I feel as though I have given your organization ample time to resolve this questionable inquiry. The credit report showed a credit inquiry by your company that I do not recall authorizing. I understand that you shouldn't be allowed to put an inquiry on my file unless I have authorized it. Please have this inquiry removed from my credit file because it is making it very difficult for me to acquire credit.

I have sent this letter certified mail because I need your prompt response to this issue. Please be so kind as to forward me documentation that you have had the unauthorized inquiry removed.

If you find that I am remiss, and you do have my authorization to inquire into my credit report, then please send me proof of this.

Thanking you in advance,

KALIMAN SARKAM
(without prejudice)

KALIMAN SARKAM
1316 TAMARIND AVE
HOLLYWOOD, CA 90028

2nd Letter

CERTIFIED MAIL: 7011 1150 0001 1886 3630

CLIENT SERVICES INC.
3451 HARRY S. TRUMA
ST CHARLES, MO 63301

NOVEMBER 12, 2013
Re: Unauthorized Credit Inquiry

To Whom It May Concern:

I am sending you a request to validate the unauthorized credit pull inquiry on: 07/10/2012 the Fair Debt Collection Practices Act and I have yet to hear from you regarding this matter. I feel as though I have given your organization ample time to resolve this questionable inquiry. The credit report showed a credit inquiry by your company that I do not recall authorizing. I understand that you shouldn't be allowed to put an inquiry on my file unless I have authorized it. Please have this inquiry removed from my credit file because it is making it very difficult for me to acquire credit.

I have sent this letter certified mail because I need your prompt response to this issue. Please be so kind as to forward me documentation that you have had the unauthorized inquiry removed.

If you find that I am remiss, and you do have my authorization to inquire into my credit report, then please send me proof of this.

Thanking you in advance,

KALIMAN SARKAM
(Without prejudice)

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input checked="" type="checkbox"/>) <div style="font-size: 1.2em; font-family: cursive;">Kaliman Sarkam</div>		DEFENDANTS <div style="font-size: 1.2em; font-family: cursive;">Client Services, Inc.</div>	
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) <div style="font-size: 1.2em; font-family: cursive;">4420 Lexington Avenue #2 Los Angeles, CA 90029 213-840-5967</div>		Attorneys (If Known) 	

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%;"> <tr> <td style="width:50%;">Citizen of This State</td> <td style="width:10%; text-align: center;">PTF DEF</td> <td style="width:10%; text-align: center;"><input checked="" type="checkbox"/> 1 <input type="checkbox"/> 1</td> <td style="width:20%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%; text-align: center;">PTF DEF</td> <td style="width:10%; text-align: center;"><input type="checkbox"/> 4 <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td></td> <td><input type="checkbox"/> 2 <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td></td> <td><input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td></td> <td><input type="checkbox"/> 3 <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td></td> <td><input type="checkbox"/> 6 <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF DEF	<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF DEF	<input type="checkbox"/> 4 <input type="checkbox"/> 4	Citizen of Another State		<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State		<input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5	Citizen or Subject of a Foreign Country		<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation		<input type="checkbox"/> 6 <input type="checkbox"/> 6
Citizen of This State	PTF DEF	<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF DEF	<input type="checkbox"/> 4 <input type="checkbox"/> 4														
Citizen of Another State		<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State		<input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5														
Citizen or Subject of a Foreign Country		<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation		<input type="checkbox"/> 6 <input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)

☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify): _____
☐ 6 Multi-District Litigation
☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No
MONEY DEMANDED IN COMPLAINT: \$ 5,000

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

EDCPA, FCRA, California Rosenthal

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage-Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 535 General <input type="checkbox"/> 540 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) (405(g)) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

CV 13-8432

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). **IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
 If yes, list case number(s): _____

VIII(b). **RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
 If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. **VENUE:** (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles, California	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	St. Charles, Mo

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
 Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles, California	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. **SIGNATURE OF ATTORNEY (OR PRO PER):** Calvin S. Saelman Date 11/13/2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))